

# EXHIBIT 3

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF CECILIA NUÑEZ  
(FUERZA LATINA)**

Cecilia Nuñez, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Cecilia Nuñez, and I am over 18 years of age and fully competent to make this Declaration.
2. I am the Vice-President of Fuerza Latina at Harvard.
3. Fuerza Latina is Harvard's undergraduate, pan-Latinx organization that seeks to expose the diversity of Latinx culture at Harvard and create a support system for Latinxs in their academic and extracurricular pursuits. We organize and co-sponsor events that promote the Latinx student's experience on campus. Through this strong community, we hope to enhance the experience of both Latinxs and other students at Harvard.
4. Fuerza Latina was originally founded in 1993 as Fuerza Quisqueyana. The club was created by ten Dominican undergraduates who envisioned a group that would specifically address Dominican issues and concerns. At the time, Harvard College had several Latinx groups, including

RAZA, Causa, and a Puerto Rican group called “La O,” but nothing dedicated to Dominican issues and cultural sharing. As an organization, Fuerza Quisqueyana brought speakers to campus, engaged in community service in Brighton (an area that housed a large Dominican community), and founded the now annual tradition of Quisque Jam, a party that features salsa, merengue, and hip-hop—music that was not heard at Harvard’s parties at that time.

5. By 1998, the membership of Fuerza was no longer mostly Dominican, as a larger Latinx community grew on campus. After the board and members began a dialogue on whether the group’s name should better reflect its membership, the name was changed to Fuerza Latina by a majority vote. The focus of the organization, however, remained unchanged because, by that time, Fuerza had taken up a much broader Latinx agenda. Today, Fuerza Latina is Harvard’s Pan-Latinx umbrella organization and boasts members from numerous Latin American countries, as well as non-Latinx members who share our interest in Latinx and Latin American culture.

6. Every Monday, Fuerza Latina hosts a dinner of some type to give people a more casual space to make connections, network, and socialize with other people on campus—essentially, students talk through their week with people who understand more of what they are going through. We have a general meeting every week and a board meeting every week. These meetings and events require a lot of planning and coordination with leaders of other cultural organizations on campus. Fuerza Latina also has overnight retreats—sometimes to speak to the Harvard administration about issues of concern to our members and improvements we want to see on campus.

7. In addition, Fuerza Latina offers a mix of social, political, and identity-based programming and discussions on issues pertinent to the Latinx community at Harvard and in the larger United States. We have sponsored debates and discussions about issues like immigration or

issues of Latinx representation in the United States. Especially in the current political climate, we feel a need to create a space for Harvard Latinx students to discuss issues that are affecting them. We also sponsor a lot of political actions on campus on issues such as affirmative action and policing of Latinx communities in Boston.

8. Fuerza Latina and other cultural organizations do a lot to provide academic support to students who do not come from a college preparatory background. We create databases of study guides, organize forums for people to talk about issues that they may be having in classes or generally on campus, and create spaces for people to get advice and receive tutoring from each other.

9. As an organization, we also have had to address insensitive incidents that affect Latinx students. For example, as part of a political protest, one of the clubs on Harvard's campus slipped fake deportation notices under doors to try to raise awareness of immigration issues, not realizing that we have people in our community who are undocumented. That incident was very scary for some of our members, and they relied on Fuerza Latina for help. Because Fuerza Latina has such a strong presence, we were able to very quickly communicate to all of our members explaining that these notices were fake and to alleviate many people's worries. But if Fuerza Latina's membership was reduced, it may not have been as successful at organizing to quickly notify the Latinx community that the deportation notices were fake, resulting in some individuals wasting time worrying about whether they or their roommate were actually being deported.

10. There have also been incidents where people don't respect the Latinx presence on campus and it helps to have a support system to respond collectively. For example, on Mexican Independence Day, a lot of us were out and celebrating at night. Some white students walked by called us "a bunch of wetbacks." I think that's one of those experiences where, because we were

in a group, we could respond and push back, but I think it would be very threatening to a student who was alone—especially because it occurred at night.

11. Our organizations have been able to come together to fight discrimination and hostility toward Latinx students, but if we didn't have a critical mass of Latinx students, we wouldn't necessarily be able to advocate for ourselves in that way and make people realize why that's not okay.

12. This case could be very damaging for Fuerza Latina in terms of our membership if there is not a critical mass of Latinx students to run the organization. We are already a small community, but if admissions for Latinx students dropped by 50%, as estimated by Harvard's expert if all considerations of race were eliminated from Harvard's admissions policy, Fuerza Latinx could not realistically be able to sustain our club, or at least not in at our current capacity. We would not be able to offer that same support to our members, leading to more isolation of Latinx students in the Harvard community.

13. This is case is particularly troubling for the Latinx community because we are comprised of diverse nationalities and a drop in admissions increases the likelihood that, for instance, there may be only one Cuban or El Salvadorian student in the entire Harvard undergraduate campus. It would be very isolating to basically be the only one. Certain sub-Latinx organizations cannot sustain themselves when there are not enough students from a particular background. A lot of Latinx clubs on campus have gone through periods of being defunct since their founding. In fact, a lot of clubs right now are not recognized as clubs by the Harvard administration because they have encountered so many difficulties to formally exist due to the fluctuation of admissions of students of various nationalities.

14. Fuerza Latina takes on a lot of responsibilities to support students on campus that are often handled by the administration at other universities. For example, other universities have multicultural centers or a dean in charge of inclusion or diversity. At Harvard, the cultural organizations have to pick up the slack in terms of creating an inclusive environment on campus for our members because Latinx students cannot assume that we necessarily have a space for ourselves.

15. Harvard does not have that much institutional support for diversity once students are admitted. I think Harvard assumed that by recruiting more people, these issues will take care of themselves. But this kind of attitude does not reflect the reality that students face—the reality is that the Harvard administration needs to step up to provide a lot more support so that students can depend on them when negative incidents happen on campus.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, July 28, 2018

/s/ Cecilia Nuñez  
Cecilia Nuñez